

SAFETY, HEALTH AND ENVIRONMENTAL MANAGEMENT SYSTEM OPERATING PROCEDURE

Document Control & Records Management

Effective Date: February 2, 2010

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A. PURPOSE AND APPLICABILITY

The purpose of this Operating Procedure (OP) is to establish a uniform method for the control of documents and the retention/maintenance of records relevant to Region 7's Safety and Health Management System (SHMS) and Environmental Management System (EMS). Per OHSAS 18001:2007 and ISO 14004:2004(E), the control of documents and records under both the SHMS and EMS are equally important to ensure:

- Documents remain legible and can be identified with the appropriate organization, division, function, activity, or contact person;
- Documents (other than records) are regularly reviewed, revised as necessary, and approved by authorized personnel prior to use;
- The current versions of relevant documents are available at all locations where operations essential to the effective functioning of the system are performed; and
- Obsolete documents are promptly removed from all points of issue and points of use.

This OP applies to all documents and records generated on behalf of Region 7's SHMS and EMS. In instances where procedures can be applied to both systems, a combined OP will be developed instead of a separate OP for each system. It is envisioned that an integrated Safety, Health, and Environmental Management System (SHEMS) will evolve. Until that integration process occurs processes, procedures, documents, records, and other pertinent components applicable to either one or both of the systems will be developed and managed as described in subsequent sections.

B. DEFINITIONS

All definitions may be found in the documents titled *US Environmental Protection Agency Region 7 Environmental Management System Terms and Definitions* contained in the Region's EMS Manual or *US Environmental Protection Agency Region 7 Safety and Health Management System Terms and Definitions* contained in the SHMS Manual. For the purposes of this OP, the following terms apply:

- Document
- Document Control
- Externally Generated Document
- Interested Party
- Internally Generated Document
- Official Version Document
- Record

C. PROCEDURAL STEPS

1. Documents

- a. Until such time as Region 7 creates a fully integrated SHEMS, the EMS Coordinator is responsible for maintaining all joint, SHEMS documents.
- b. To ensure the legibility of documents, all internally generated SHMS, EMS, and SHEMS documents should be prepared using the Region's standard word processing program and saved in a format that can easily be viewed by others. Agency guidelines, which call for 1-inch margins and 12-point Times New Roman font, should be used as the default format.
- c. All externally generated SHEMS and EMS documents must be forwarded to the EMS Coordinator as soon as is practical so they may be properly controlled in accordance with this OP. Similarly, all externally generated SHMS documents must be forwarded to the SHMS Coordinator for proper management.
- d. All SHMS and EMS documents must comply with the following requirements:
 - (1) **Document Control Code:** A Document Control Code (DCC) must be assigned to every Region 7 SHMS and EMS document by the SHMS or EMS Coordinator for their respective system. The EMS Coordinator will assign DCCs for SHEMS documents in consultation with the SHMS Coordinator. DCCs are a ten-digit alphanumeric code with a format of XXX.XXXX.XXX where the first three digits represent a document's EPA Record Schedule (Item) Number (as defined in the Region 7 SHEMS File Plan found at Attachment 1); the middle four digits define the type of document; the next two digits define the specific document within a document type series; and the last digit defines the document's revision status. A "SHMS" prefix will be added to the DCC for all SHMS documents covered by this OP. Similarly, EMS documents will have an "EMS" prefix and SHEMS documents will have a "SHEMS" prefix. Documents will be numbered sequentially within the following document type codes:
 - Management Review Documents – 1000 series
 - Management Program (MP) Documents – 2000 series
 - Operational Control (OC) Documents – 3000 series
 - Aspect/Significant Aspect Lists and Hazard/Risk Lists – 4000 series
 - Audits – 5000 series
 - External Conformance Audit Documents – 5100 series
 - Internal Conformance Audit Documents – 5200 series
 - Internal Compliance Assessments – 5300 series
 - External Compliance Assessments – 5400 series
 - Corrective/Preventive Action Plans – 5500 series

- Training Documents – 6000 series
- Operating Procedure (OP) Documents – 7200 series
- Employee Suggestion Documents – 8000 series
- Miscellaneous Documents – 9000 series

Specific document numbers will be assigned sequentially within a series as new documents are added. Revision codes will be assigned sequentially, A through Z, whenever the document is revised. For example, the fourth revision to this OP would have a DCC of SHEMS 006.7210.02D.

- (2) **Document Identification:** Except as noted below, all documents will include the following information in the header in the upper right-hand corner of each page of the document:

EMS (or SHEMS or SHMS) (DCC)
(Date)
Page of

The EMS or SHMS Coordinator may determine that it is inappropriate for some documents, such as poster versions of policy statements, to be labeled with this information. In these instances, the Coordinator will assign a DCC and note this decision, as well as a description of the document, on a memo in the EMS or SHMS Manual as appropriate.

- (3) **Responsible Person:** Most, but not all documents, will have the person responsible for maintaining the document identified within the document. Examples of documents that follow this convention include OPs and OC and MP forms when they are filled out. Examples of documents that would not follow this convention include external conformance audit reports and blank OC and MP forms. Documents not specifying a responsible person will be the responsibility of the EMS or SHMS Coordinator as appropriate.
- (4) **Document Reviews:** The current versions of active documents, except for audit (5000 series) and employee suggestion (8000 series) documents, should be reviewed periodically, either by the responsible person or someone designated by the EMS or SHMS Coordinator, to determine their continued adequacy, suitability, and relevance. The reviewer should place a memo in the appropriate Working Files folder to capture document reviews that are not otherwise annotated on the document itself. Documents that are no longer needed should be retired in accordance with EPA document retention guidelines.

- d. The EMS Coordinator will maintain an EMS Manual that contains (or provides direction to) the current, official versions of all documents and any records deemed crucial to operating the system. The EMS Manual will be electronic and

maintained on the Region 7 local area network (LAN). The sections of the Manual will align with the sections of ISO 14001:2004(E) and cross reference the Region 7 SHEMS File Plan as shown in Attachment 2. The EMS Coordinator will control access to the Manual. The footer section of official versions of documents will be annotated with the phrase "UNCONTROLLED WHEN PRINTED". Similarly, the SHMS Coordinator will maintain and control access to a SHMS Manual that aligns with sections of OHSAS 18001 and cross references the file plan at Attachment 2. Official versions of SHMS documents, as well as SHEMS documents, will also have the phrase "UNCONTROLLED WHEN PRINTED" annotated in the footer section.

As Region 7 continues to develop and implement its SHMS, certain documents will be created that serve both the SHMS and EMS, and will eventually serve a fully integrated SHEMS. As noted above, these documents are designated as SHEMS documents and are developed and maintained by the EMS Coordinator with the concurrence of the SHMS Coordinator. Official versions of these documents will be placed in both the EMS and SHMS Manuals until the SHEMS is developed and a new SHEMS Manual is established.

Management Program and Operational Control Leads are responsible for the official documents, miscellaneous documents, and records needed to properly maintain their program / control. As such, the EMS and SHMS Coordinators will create sections of their Manuals on the share drive portion of the LAN and provide the Program and OC Leads with access to them.

To ensure EMS documents are available to the Region 7 staff and interested parties external to the Region, copies of selected documents will be posted on the Region's EMS Internet site in accordance with the guidelines contained in the current version of the EMS Internal and External Communications OP (EMS 006.7210.08). The EMS Coordinator will provide new/updated EMS documents to PLMG/SIIM(IRMS) for posting to the Internet site on an as needed basis, typically quarterly. SHMS documents will not be posted on the Internet at this time.

- f. Unless prescribed by other Headquarters EPA or Region 7 directives, non current versions of EMS and SHMS documents will be retained by their respective Coordinator for three years or until the completion of the first external conformance audit following their removal from service, whichever is later.
2. **Records**
- a. The generation / completion of records are typically specified in OPs, OC documents, and management program documents. These documents will specify the name of the record, its location, and the person responsible for maintaining it

so as to ensure it is traceable to the activity involved. In determining where to maintain records, it is generally best to keep them as close as feasible and practical to where they are generated, or to the location of the activity leading to their generation. Most hardcopy records will be maintained in the management system files located in offices belonging to the EMS or SHMS Coordinator, Management Program Leads, or OC Leads. Electronic copies may be stored on the Region's email server or on the LAN in "EMS Working Files" or "SHMS Working Files" folders.

- b. Records must be neat (legible) and stored/maintained in such a way so as to prevent their loss or damage.
- c. Records will be annotated with the following information in the header in the upper right-hand corner of each page:

EMS (or SHMS) Record
(Date)

- d. Unique record keeping retention requirements may be specified in the OP or other governing document that directs the generation and/or maintenance of records. If there is no applicable governing document, the records will be kept for three years or until the completion of the first external conformance audit since the record was generated, whichever is later.
- e. Records that need to be made accessible to all Region 7 personnel and/or external stakeholders will be forwarded to the EMS or SHMS Coordinator, as appropriate, for distribution.

D. RECORDS MANAGEMENT

This OP may require the generation of the following records:

<u>Record</u>	<u>Responsible Person</u>	<u>Record Location</u>
Document Review Memo	EMS Coordinator	EMS Files
Document Review Memo	SHMS Coordinator	SHMS Files

This OP may also result in the generation of additional EMS or SHMS records. Any records created will be managed in accordance with the most current version of SHEMS 006.7210.02, *Document Control & Records Management*.

E. QUALITY ASSURANCE AND QUALITY CONTROL

The use of DCCs described in Paragraph c (1) above, along with a consistent application of the remaining document control/records management approach defined in this OP, should

achieve suitable results to the issues described in Section A above. Ultimately, the quality assurance and quality control (QA/QC) success of the document control/records management process and this OP will be determined through the internal and external conformance audit processes. Deficiencies noted during these audits will be managed through the Region's Corrective/Preventive Action Process as defined in the current version of SHEMS 006.7210.12.

F. REFERENCES

Current versions of the following references are assumed if no date is provided.

1. ISO 14004:2004(E); *Environmental Management Systems – General Guidelines on Principles, Systems, and Support Techniques*; November 15, 2004
2. OHSAS 18001:2007; *Occupational Health and Safety Management Systems – Requirements*; July 2007
3. *US Environmental Protection Agency Region 7 Environmental Management System Terms and Definitions*
4. *US Environmental Protection Agency Region 7 Safety and Health Management System Terms and Definitions*
5. US EPA R7, *Corrective/Preventive Action Process*, SHEMS 006.7210.12
6. US EPA R7, *Environmental Management System Audit*, EMS 006.7210.13

ATTACHMENT 1
EPA Region 7 Safety, Health, and Environmental Management System
File Plan

Function	Item	Description
0	008	a Non-Record Materials
108		Environmental Management: EPA Programs (Mission)
	005	a Special Studies Supporting Documents
301-091		Corrective Action and Preventative Action
	082	a Response to Audit, Evaluation, and Investigation <ul style="list-style-type: none"> • Nonconformance • Corrective Action: Documenting and Tracking Milestones • Preventive Action • Audit Response • Evaluation • Incident Investigation
301-092	192/193	Program Evaluation <ul style="list-style-type: none"> • Conformance Audits • Compliance Audits/Assessments • Certifications (ISO/OHSAS/LEED)
301-093		Program Monitoring
	006	a Program Management Files <ul style="list-style-type: none"> • Aspects and Significant Aspects (Environmental and Energy Decision-Making) • Hazard and Risk Assessment (Job Hazard Analyses; Ergonomic Assessments) • Objectives and Targets Site and Landscape Issues <ul style="list-style-type: none"> ○ Building Design and Operations ○ Energy Management ○ Water, Wastewater & Stormwater Management ○ Recycling ○ Indoor Environmental Quality ○ Transportation: Fleets, Fuels & Alternative Modes

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		<ul style="list-style-type: none"> • Management Plans <ul style="list-style-type: none"> ◦ Documenting and Tracking Milestones • Reporting (SHEMD) • Operational Procedures • Monitoring and Measuring
304-107	105	Program Planning and Design Management Reviews – periodic and annual
305-109	089	Official Information Dissemination a Information Tracking Systems <ul style="list-style-type: none"> • Version of the electronic tracking system (Integrated Performance Tracking System – Future)
305-109-02-03	095	Official Information Dissemination b Web Sites <ul style="list-style-type: none"> • EMS Internal • EMS External • SHMS Internal
305-109-02-04	081	Official Information Dissemination a Public Awareness Files <ul style="list-style-type: none"> • External Affairs <ul style="list-style-type: none"> ◦ Green Building Education • Community Outreach Materials • Briefings • News Clippings • Press Releases • Fact Sheets
	200	c Training Materials <ul style="list-style-type: none"> • Materials used to Plan and Prepare Training • Workgroup Meeting Notes on Training • Training Participation Surveys and Rosters • Instructional Materials, Manuals and Training Aids • Training Presentations: <ul style="list-style-type: none"> ◦ General Awareness Training ◦ Refresher Training

- Practitioner Training
- Miscellaneous Training
- 250 a Publications and Promotional Items Depicting EPA's Environmental Mission Activities
 - Toys and Promotional Items
 - Brochures, Pamphlets, Posters, Buttons, etc.
- 306-112
- 007 a **Policy and Guidance Development**
Directives and Policy Guidance Documents Issued by Specific Programs and Regions
 - Legal and Other Requirements
 - Legislative and Regulatory
 - Federal Directives and Policy
 - EPA Agency Directives and Policy
 - Region 7 Directives and Policy
 - Standards
 - Others
 - Region 7 Policy
 - Region 7 Scope
 - Region 7 Operational Controls
 - Terms and Definitions
 - Roles, Responsibilities, Accountability, and Authority
- 401
- 110 a **Administrative Management**
Office Administrative Files
 - Program Budget Materials
 - Financial Analysis and Planning
 - Copies of Purchase Documents
- 187 a Internal Communications
 - Participation and Consultation
- 403-255-01 571 b Personnel Training Records – Employee Training
 - Class Sign-in Sheets
 - Registrar Records

ATTACHMENT 2

SHEMS File Plan / ISO 14001:2004(E) / OHSAS 18001:2007 Cross Reference Table

Section Number	ISO 14001:2004(E) Section Heading	OHSAS 18001:2007 Section Heading	Region 7 SHEMS File Plan Item Code
3.0	Terms and Definitions	Terms and Definitions	007
4.1	General Requirements	General Requirements	007
4.2	Environmental Policy	OH&S Policy	007
4.3.1	Environmental Aspects	Hazard Identification, Risk Assessment, and Determining Controls	006
4.3.2	Legal and Other Requirements		007
4.3.3	Objectives, Targets and Programs	Objectives and Programs	006
4.4.1	Resources, Roles, Responsibility and Authority	Resources, Roles, Responsibility, Accountability, and Authority	007
4.4.2	Competence, Training and Awareness	Competence, Training, and Awareness	571
4.4.3	Communication	Communication, Participation, and Consultation	095 / 081 / 110 / 187
4.4.4	Documentation	Documentation	006
4.4.5	Control of Documents	Control of Documents	006
4.4.6	Operational Control	Operational Control	007
4.4.7	Emergency Preparedness and Response	Emergency Preparedness and Response	NA (Currently managed through Region's Occupancy Emergency Plan)
4.5.1	Monitoring and Measuring	Performance Measurement and Monitoring	006
4.5.2	Evaluation of Compliance	Evaluation of Compliance	192/193

4.5.3	Nonconformity, Corrective Action, and Preventive Action	Incident Investigation, Nonconformity, Corrective Action, and Preventive Action	082
4.5.4	Control of Records	Control of Records	006
4.5.5	Internal Audit	Internal Audit	192 / 193
4.6	Management Review	Management Review	105